



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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January 27, 2000

Johnny Pappas, Sr. Environmental Engineer
Plateau Mining Corporation
847 Northwest Highway 191
Helper, Utah 84526

Re: Willow Creek As-Built, Stream Channel Relocation, Plateau Mining Corporation,
Willow Creek Mine, ACT/007/038-AM99H, Outgoing File.

Dear Mr. Pappas:

Enclosed is the As-Built Stream Channel Relocation Technical Analysis completed by the Division. There are a few remaining issues that need to be addressed prior to approval. The Plateau Mining Corporation may submit the remaining information to address the outstanding deficiencies with the requisite number of copies which can be directly incorporated into the plan. Once the outstanding deficiencies are verified, the approved stamped copy will be returned to you with an approval letter. The applicant may wish to submit this information with other approved as-built information to assure pagination is accurate, due on February 29, 2000.

It is recommended that you meet with division staff and discuss these deficiencies as well as how to incorporate the corrected pages into the existing plan.

If you have any questions, please call me.

Sincerely,

A handwritten signature in cursive script, reading 'Pamela Grubaugh-Littig'.

Pamela Grubaugh-Littig
Permit Supervisor

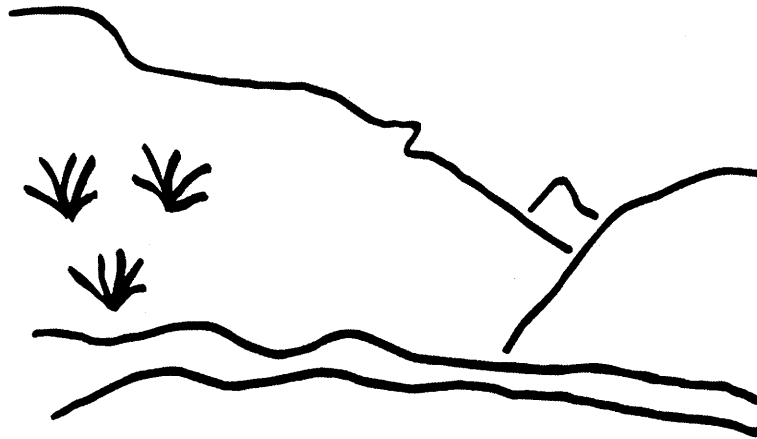
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Enclosure

cc: Price Field Office

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State of Utah



Utah Oil Gas and Mining

Coal Regulatory Program

Willow Creek Stream Channel As-Built
ACT/007/038- AM99H-1
Technical Analysis
January 25, 2000

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TECHNICAL ANALYSIS

INTRODUCTION

Cyprus Plateau Mining Corporation (CPMC) submitted an amendment to obtain approval for changes made during the mine construction at the Willow Creek Mine. The changes were included in four volumes submitted to the Division on April 30, 1999 and in revised pages submitted on August 3, 1999 and on October 29, 1999. The October 29, 1999 submittal also included minor changes to disturbed area drainage at DD-40 B and DD-40A. Information including the Willow Creek construction details were submitted on November 4, 1999.

CPMC should be requested to supply the requisite number of copies without redline strikeout which can be directly incorporated into the plan by the project lead. The applicant should be informed the approved stamped copy will be returned to them with an approval letter after a submittal, complete for incorporation, is verified.

CPMC could be allowed to submit this information with the remaining as-built information to be provided, if the outstanding deficiencies are verified prior to incorporation into the permit.

SUMMARY OF OUTSTANDING DEFICIENCIES

The Technical Analysis regarding the proposed permit changes is not complete at this time, pending submittal of additional information by the permittee and further review by the Division, to address outstanding deficiencies in the proposal. A summary of those outstanding deficiencies is provided below. Additional comments, concerns and deficiencies may also be found within the analysis and findings made in this Draft Technical Analysis which have not been presented in this summary.

Accordingly, the permittee must address those deficiencies as found within this Draft Technical Analysis and provide the following, prior to approval, in accordance with the requirements of:

- R645-301-120**, Page number do not coalesce with pages in the existing plan. The pages may coalesce with the previously approved As-built information. This information must coalesce with the approved as-built application. 3
- R645-301-512**, Maps in Exhibit 14, - Willow Creek Realignment Plan need to be certified. 3
- R645-301-521.140**, Longitudinal "as-built" information provided on Sheets 1 and 2 in Exhibit 14, - Willow Creek Realignment Plan needs to include a cross-reference to the map showing the locations of the segments included in the profile (One should be able to locate P-1 on Willow creek from a topographic map). 3

OPERATION PLAN

FISH AND WILDLIFE INFORMATION

Regulatory Reference: 30 CFR Sec. 784.21, 817.97; R645-301-322, -301-333, -301-342, -301-358.

Analysis:

Protection and enhancement plan

The applicant monitored fish and macro invertebrate populations in Willow Creek from 1995 through 1998. The monitoring in 1998 showed populations had returned to nearly the levels that existed prior to the stream being relocated, and the application contains a letter from the Division of Wildlife Resources indicating it is no longer necessary to monitor these populations. The Division has reviewed the information and also believes further monitoring is not necessary unless there are additional disturbances to the stream.

The application also contains information about a project done to mitigate for the loss of big game habitat at the mine site. The permittee purchased 40 acres of land in the Gordon Creek Wildlife Management Area and donated it to Wildlife Resources. This will allow Wildlife Resources to manage the land as big game winter range.

Findings:

Information provided in the proposal is adequate to meet the requirements of this section of the regulations.

HYDROLOGIC INFORMATION

Regulatory Reference: 30 CFR Sec. 773.17, 774.13, 784.14, 784.16, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-300-140, -300-141, -300-142, -300-143, -300-144, -300-145, -300-146, -300-147, -300-148, -301-512, -301-514, -301-521, -301-531, -301-532, -301-533, -301-536, -301-542, -301-720, -301-731, -301-732, -301-733, -301-742, -301-743, -301-750, -301-761, -301-764.

Analysis:

Stream buffer zones

The approved plan proposed the 100 foot stream buffer zone along Willow Creek would be maintained through the facilities area except in a 200 foot segment at the main access road bridge crossing, and along a 800 foot length of Willow Creek reconstruction. The final construction resulted in

OPERATION PLAN

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reduced buffer zones of 600 feet along two 300 foot linear stretches, in addition to, the 900 linear feet of Willow Creek reconstruction. The existing segments disturbed within the 100 foot buffer zone and a

couple cross sections are presented in Figure 7 and 5 in Exhibit 14 - Willow Creek Realignment Plan on and on Map 18. Longitudinal "as-built" information is provided on Sheets 1 and 2 in Exhibit 14, but there is no reference to a cross section location map and the map is not certified.

Additional information provided includes photo documentation, correspondence from interested agencies, and a summary including construction element that changed from the proposed design.

Findings:

This amendment needs to include the following in accordance with the requirements of:

R645-301-521.140, Longitudinal "as-built" information provided on Sheets 1 and 2 in Exhibit 14, - Willow Creek Realignment Plan needs to include a cross-reference to the map showing the locations of the segments included in the profile (One should be able to locate P-1 on Willow creek from a topographic map).

R645-301-512, Maps in Exhibit 14, - Willow Creek Realignment Plan need to be certified.

R645-301-120, Page number do not coalesce with pages in the existing plan. The pages may coalesce with the previously approved As-built information. This information must coalesce with the approved as-built application.

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